

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re

Alexander E. Jones,

Debtor,

Bankruptcy

Case No. 22-33553 (CML)

Chapter 11

In re

Free Speech Systems LLC,

Debtor,

Bankruptcy

Case No. 22-60043 (CML)

Chapter 11

**MOTION TO SEAL**

Alexander E. Jones (“Jones”) and Free Speech Systems, LLC (“FSS”), the debtors and debtors-in-possession in the above captioned chapter 11 cases (collectively, the “Debtors”) hereby respectfully requests the Court seal Exhibit A to the proposed *Agreed Order on Debtors’ Motion for Approval of Compromise and Settlement Under Federal Rule of Bankruptcy Procedure 9019* (“Agreed Order”) and submits this Motion to Seal pursuant to Sections 107(c) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9037 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), and Rule 9037-1 of the Local Bankruptcy Rules for the Southern District of Texas (the “Local Rules”).

Given the public nature of these proceedings and the fact that the settlement contemplates potential and future trials, the Debtors request the dollar amounts set forth in Exhibit A to the Agreed Order be filed under seal. Exhibit A shall be provided to the U.S. Trustee and parties to the protective order entered in these cases.

Dated: June 9, 2023  
Houston

**CROWE & DUNLEVY, P.C.**

By: /s/ Vickie L. Driver  
Vickie L. Driver  
State Bar No. 24026886  
Christina W. Stephenson  
State Bar No. 24049535  
2525 McKinnon St., Suite 425  
Dallas, TX 75201  
Telephone: (737) 218-6187  
Email: dallaseservice@crowedunlevy.com

-and-

**JORDAN & ORTIZ, P.C.**

By: /s/ Shelby A. Jordan  
Shelby A. Jordan  
State Bar No. 11016700  
S.D. No. 2195  
Antonio Ortiz  
State Bar No. 24074839  
S.D. No. 1127322  
500 North Shoreline Blvd., Suite 900  
Corpus Christ, TX 78401  
Telephone: (361) 884-5678  
Facsimile: (361) 888-5555  
Email: sjordan@jhwclaw.com  
Email: aortiz@jhwclaw.com

*Counsel to Alexander E. Jones*

**LAW OFFICES OF RAY BATTAGLIA, PLLC**

By: /s/ Ray W. Battaglia  
Raymond W. Battaglia  
State Bar No. 01918055  
66 Granburg Circle  
San Antonio, Texas 78218  
Tel. (210) 601-9405  
Email: rbattaglia@outlook.com

*Counsel to Free Speech Systems, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion was served upon all parties receiving or entitled to notice through CM/ECF on this 9<sup>th</sup> day of June, 2023.

/s/ Ray Battaglia

Raymond W Battaglia